To: Romanowski, Larisa[Romanowski.Larisa@epa.gov]; Tames, Pam[Tames.Pam@epa.gov]
Cc: Joanne Mahoney[JoanieMahoney@ongov.net]; Brian F. May[bfmay6@yahoo.com]; Casey Jordan[cejordan@cnymail.com]; Christopher Ryan[cjryan123@yahoo.com]; Danny Liedka[legislatorliedka@gmail.com]; David Knapp[dknappmb@aol.com]; Derek Shepard, Jr.[shepard@twcny.rr.com]; J. Ryan McMahon, II[jryanmcmahon@gmail.com]; Jim Corl[jcorl1@twcny.rr.com]; John Dougherty[john@johndougherty.org]; Judith Tassone[tassone@twcny.rr.com]; Kathleen Rapp[RappKathleen5@gmail.com]; Kevin Holmquist[kevinholmquist@reagan.com]; Linda Ervin[ervinforcountyleg@gmail.com]; Michael Plochocki[mikeplochocki@hotmail.com]; Monica Williams[williamsforleg@yahoo.com]; Patrick Kilmartin[pkilmartin@oncountyleg.com]; Peggy Chase[peggychase2013@twcny.rr.com]
From: Bob Papworth
Sent: Fri 9/12/2014 12:32:56 AM
Subject: Lower Ley Creek Site of the Onondaga Lake Superfund Project: Public Comment for EPA
RFI 08.22.2014 Papworth Onondaga Lake.Letter.pdf

Dear Ms. Romanowski and Ms. Tames:

The following comments are submitted for the proposed plans within the comment period, which was extended until Sept. 13th.

The EPA's proposed plan would excavate and remove nearly 100,000 cubic yards of sand from Lower Ley Creek. The plan would not clean the sand, but would remove and dispose the sand in a toxic landfill in the Township of Salina, N.Y., where it would permanently remain.

The alternate plan, which I propose, will temporarily remove the sand, thermally treat the sand to remove all toxic elements, then return the cleaned sand to its original landscape locations.
There will be no disposal into a toxic landfill. This plan has been previously transmitted to the Onondaga County Executive Mahoney, and to the County Legislature.

Please note that the vendor which has provided this proposal (attached above) is experienced in serving the mining industry. The proposed treatment is based on the existing N.Y.S. D.E.C. Data Base, as well as the Lower Ley Creek Feasibility Study data. The vendor, Noble Metals Extraction, LLC., plans to treat the sand with thermal desorption, supplemented by mechanical removal techniques to extract heavy metals. This is a process commonly employed in the mining industry, and is appropriate to the Lower Ley Creek contaminant components.

In addition, please note the explanation of thermal desorption, which is provided on the EPA web-site. The most accessible document is titled: " A Citizen's Guide to Thermal Desorption". In addition, there is a Wikipedia page which explains Thermal Desorption.

The plan which is proposed by Noble Metals will thermally remove volatile toxics and light metals. Then, mechanical methods will remove heavy metals. All toxic components would be captured for subsequent destruction. The sand would be

clean. And, the proposed process rate of approximately 1,000 cubic yards per day would complete sand cleaning at the Lower Ley Creek site in approximately 4 months of processing.

The budget for this new proposal for Lower Ley Creek remediation is within the budget which was presented at the public hearing at the Town of Salina this summer.

Moreover, following the completion of the Lower Ley Creek remediation work, the same process can be carried out for the Upper Ley Creek site. The capital investment need not be repeated. In addition, following the completion of the Upper Ley Creek site, the remediation plant could be moved to the opposite side of the lake, again without repeating the original capital investment. The polluted sands in the several sites on the west side of the lake would be remediated in the same manner, with no toxic landfilling, and returning the cleaned sand to its natural landscape locations.

The result would be actually to clean the sand, not create toxic landfills. And operate competitively, within the alternate budgets.

It is the only plan of remediation which will actually clean the sand. It is the only possibility to restore to natural and normal both Onondaga Lake and its watershed. And, it is the only plan which avoids permanent toxic landfills in our communities.

Respectfully,

Robert A. Papworth, Trustee
The Nature Conservancy, CWNY